

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO**

MANNY FILM, LLC.)	
)	
Plaintiff,)	Civil Action Case No. 3:15-cv-00441-JGC
)	3:15-cv-00442-JGC
)	3:15-cv-00443-JGC
		3:15-cv-00514-JZ
v.)	3:15-cv-00515-JZ
)	3:15-cv-00516-JZ
JOHN DOE subscriber assigned IP address)	<i>Consolidated: Lead Case: 3:15-cv-00440-JGC</i>
134.228.64.236,)	
)	
Defendant.)	
)	

**PLAINTIFF'S FIRST MOTION FOR EXTENSION OF TIME WITHIN WHICH IT HAS
TO EFFECTUATE SERVICE OF PROCESS ON JOHN DOE DEFENDANT**

Plaintiff, Manny Film, (“Plaintiff”), hereby moves for the entry of an order extending the time within which Plaintiff has to Effectuate Service of Process on John Doe Defendant, and states:

1. This is a copyright infringement case against a John Doe Defendant known to Plaintiff only by an IP address. Defendant’s true identity is known by his or her internet service provider (“ISP”).
2. Plaintiff filed its Motion for Leave to Serve a Third Party Subpoena on March 6, 2015 [CM/ECF 2].
3. On March 25, 2015, this Court entered an Order re Consolidation [CM/ECF 9].
4. On March 26, 2015 the Court granted leave for Plaintiff to serve a third party subpoena on Defendant’s ISP, Buckeye Cablevision, to obtain Defendant’s identifying information [CM/ECF 10].

5. Plaintiff served its subpoena on Defendant's ISP on March 30, 2015. The requested compliance date was on or about May 18, 2015.

6. To date, no response has been received from Defendant's ISP.

7. Accordingly, since Plaintiff is not in possession of Defendant's identity, service has not been effectuated. Undersigned will follow up with Defendant's ISP imminently until Defendant John Doe is identified.

8. Pursuant to Rule 4(m), Plaintiff is required to effectuate service on Defendant no later than July 4, 2015.

9. Procedurally, Plaintiff respectfully requests that the time within which it must effectuate service of a summons and Complaint on the Defendants be extended an additional sixty (60) days, or until September 4, 2015.

10. None of the parties would be prejudiced by the granting of this extension.

WHEREFORE, Plaintiff respectfully requests that the time within which it must serve the Defendant with a summons and Complaint be extended an additional sixty (60) days, or until September 4, 2015. A proposed order is attached for the Court's convenience.

Dated: July 6, 2015

Respectfully submitted,

YMF, INC.: The Law Office of Yousef M. Faroniya

/s/ Yousef M. Faroniya

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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on July 6, 2015, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF and that service was perfected on all counsel of record and interested parties through this system.

By: /s/ Yousef M. Faroniya